

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF WISCONSIN

---

K.F.,

Plaintiff,

vs.

Case No. 13-cv-0918

CITY OF MILWAUKEE, EDWARD FLYNN,  
EDITH HUDSON, JASON MUCHA,  
MICHAEL VAGNINI, and JACOB KNIGHT,

Defendants.

---

**STIPULATION REGARDING  
ORDER OF CONFIDENTIALITY**

---

The undersigned counsel on behalf of the represented parties in the above-captioned matter, hereby agree and stipulate that the following information:

1. personally-identifiable information, including dates of birth, social security numbers, home addresses, and phone numbers;
2. information which can in any way identify a juvenile;
3. information which can in any way identify a confidential informant;
4. financial information, including banking-related account numbers, the identification of any financial institution along with any individual who maintains an account with that institution; income tax information and mortgage-related information;
5. health-care-related information, including information which is related to physical, psychological or general medical care or treatment;
6. emergency-contact information provided by employees, persons arrested or in custody, complainants, or witnesses;
7. information which can in any way identify the spouse, child(ren), or other family members of a City of Milwaukee employee;
8. information related to divorce or child custody disputes; and

9. information with can in any way identify the victim of a sexual assault, attempted sexual assault, rape, attempted rape or domestic violence.

found in any documents produced by the City of Milwaukee and/or any subdivision of the City of Milwaukee, including, but not limited to, the Milwaukee Fire and Police Commission, the Department of Employee Relations, and the Milwaukee Police Department, pursuant to informal request or formal discovery, and any background investigation files, testing records, and files regarding ongoing criminal investigations, and any portion of any deposition testimony, sworn affidavit or other document, record or recording which refers to or discusses such information or documents, will be maintained in the strictest confidence, consistent with Civil L.R. 26(e). Said information, documents, deposition testimony, affidavits, records or recordings may be used by the parties only for purposes related to the pending litigation, and may only be divulged to the parties, their attorneys or their experts. Furthermore, should any such information, documents, deposition testimony, affidavits, records or recordings be included within any court filing, said court filing will be filed with the court under seal, and will be placed in an envelope marked "Confidential."

PEOPLE'S LAW OFFICE

Dated: 2/3/2014

s/Ben H. Elson  
ATTORNEY BEN H. ELSON  
State Bar No. 1055444  
Attorneys Plaintiff

GRANT F. LANGLEY  
City Attorney

Dated: 2/3/2014

s/Susan E. Lappen  
SUSAN E. LAPPEN  
Assistant City Attorney  
State Bar No. 01003567  
Attorneys for Defendants

P.O. ADDRESS:

800 City Hall  
200 East Wells Street  
Milwaukee, WI 53202  
Telephone: 414-286-2667  
Fax: 414-286-8550  
Email: [slappe@milwaukee.gov](mailto:slappe@milwaukee.gov)

1032-2013-2335:199537